

Case 5:20-cv-03511-MSC Document 127 Filed 05/10/23 Page 1 of 4  
In the United States District Court for the Eastern District of  
Anthony Mustafa Life Williams | P 12  
vs 20 - CV - 3511  
WARDEN Kyle Russell

Plaintiff's Motion to Reopen Sanctions Motion Against Counsel  
under Fed. R. C. pro 6d (B)

Now comes the plaintiff pro se who submit the following:

- ① ON 12/22/22 plaintiff filed Document 102 seeking sanctions against the Defendant's Attorney MR Lucas Repka for his statements in Document 99-3, the Defendants' responses to plaintiff's request for production of documents.
- ② ON 1/17/23 in this court's opinion the court said that it is denying my motion because: "Plaintiff has not established that Defendants' counsel made any misrepresentations in discovery responses."
- ③ ON 5/2/23 the plaintiff was able to view the flash drive sent by the Defendant's Attorney which shows a complete view of the cells ON 6/24/20 AND 6/25/20. I requested these videos in NOV AND I just received them, despite doing my due diligence in retrieving them.
- ④ Pursuant to Fed. R. Civ. pro 26(G) 3 All Attorneys must sign and certify that the information, after reasonable inquiry it is complete AND correct. Now pursuant to Defendants' Attorney Document 99-3, filed 11/8/22, entitled: "Defendants responses to plaintiff's request for production of documents." There are two misrepresentations used by them to deny my request for inmate names. First, As part of #7 in their answer they state: "Inmates housed in this section of the jail are in cells with no window into other cells or the common area, and the inmates were locked in their cells when



Mr Williams was transported from his previous cell assignment to Housing Unit 3C. for this reason, it is impossible for any other inmate to have seen any of the Alleged "Assault" on plaintiff. The second statement is at #8 of his response and it says: "... Plaintiff's request for names, locations and current locations of all inmates that were housed on 3C1 on June 24, 2020 and June 25, 2020... it seeks information about persons who have no information about what occurred at the Lehigh County Jail on housing unit 3C1 on June 24 or June 25, 2020."

⑤ As to their first statement, most of the cells on 3C1 are open bar and those on both 3C1 and 3C2 that are not never the less except 1 thru 5, 25 thru 29 on 3C1 can see the area where the assault happen. further, all cells on 3C face the common area. The DVD of 6/24/20 and 6/25/20 support my version and not the misstatement of the Defendants' Attorney.

⑥ The second statement, as stated in #5 supra, all the cells on 3C1 on 6/24/20 and 6/25/20 faced the common area, some inmates are seen on the door when the assault happen on 6/25/20 and so how they can't provide information is not understood other than to misrepresent the public record fact of the way the cells are designed does show they could have seen the incident and the video shows several DID.

⑦ Now the plaintiff is a prisoner who cannot send a copy of his flash drive to the court, but the Defendants' counsel can. A copy of the 6/24/20 and 6/25/20 video can truly show the truth



of these two statements. Had I had the ability to have sent these videos to the court along with my motion for sanctions I would, since they wasn't in my position then AND I have not been able to see them until now, 5/2/2023 this is new information that I couldn't show what I believe to be fraud on the court until now.

Wherefore for the above, I ask that this court order the Defendants to provide a copy of the 6/24/20 AND 6/25/20 videos, view the 2 statements cited in this motion, reopen this court's 1/17/23 order AND sanction appropriately Defendants Attorney, as well as to order them to provide the information requested in my Document #111, which most of which centers around this issue.

5/3/23

Respectfully



Verification of service

I Anthony Williams do verify that I have caused a copy of the enclosed, via first class mail, properly addressed, to the Defendants on this 5/3/23, by putting the same in the mailbox at the prison

5/3/23

Respectfully





Smart Communications/PADOC

SCI- *Sampsonst*

Name *Anthony Williams*

Number *QJ-4374*

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St Petersburg FL 33733

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